

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CENTRAL DIVISION

JAMES J. SANDLER, Individually and as
Trustee of the TOWN PAINT & SUPPLY CO.,
INC. 401(k)/PROFIT SHARING PLAN, and
TOWN PAINT & SUPPLY CO., INC.,

Plaintiffs,

v.

CIPC SYSTEMS, INC. and
RICHARD A. PERRY,

Defendants.

Civ. No. 05-40073

JOINT REPORT OF RULE 26(f) CONFERENCE

Pursuant to Rule 26(f), Fed. R. Civ. P., the undersigned attorneys for the parties submit this report of a telephonic conference held on October 7, 2005 to discuss a discovery schedule and related matter.

1. Automatic Disclosures. Plaintiff has produced its statement of its Initial Disclosures under Rule 26(a)(1), Fed. R. Civ. P. and Local Rule 26.2. The defendants will produce their statement(s) of their Initial Disclosures by November 25, 2005.

2. Discovery and Motion Schedule. The parties' proposed timetable for completing the various phases of discovery and serving and filing various dispositive motions is as follows:

<u>EVENT</u>	<u>Proposed Deadline for Completion</u>
Fact Discovery	May 15, 2006
Plaintiff's identification of experts and disclosure of information pursuant to Fed. R. Civ. P. 26(a)(2)	June 15, 2006
Defendant's identification of experts and disclosure of information pursuant to Fed. R. Civ. P. 26(a)(2)	July 14, 2006
Expert Depositions	August 14, 2006
Summary judgment motions filed	September 15, 2006

3. Discovery Limits. The parties agree that they will be able to conduct discovery within the limits set forth in Local Rule 26.1 (c).

4. Any Other Orders That Should Be Entered by the Court. The parties do not foresee any other orders that should be entered by the Court at this time.

JAMES J. SANDLER, Individually and as
Trustee of the TOWN PAINT & SUPPLY
CO., INC. 401(k)/PROFIT SHARING
PLAN, and TOWN PAINT & SUPPLY
CO., INC.,

By their attorneys,

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Dated: November 15, 2005